

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALEX GOLDFARB,

Plaintiff,

- against -

CHANNEL ONE RUSSIA,

Defendant.  
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**NOTICE OF MOTION FOR  
TURNOVER ORDER**

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Index No.: 18-CV-08128 (JPC)

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PLEASE TAKE NOTICE that based upon the accompanying Declaration of Bertrand C. Sellier, Esq. and the exhibits annexed there to, and upon the accompanying Memorandum of Law, Plaintiff and Judgment Creditor Alex Goldfarb ("Plaintiff") hereby moves this Court, pursuant to Fed. R. Civ. P. 69 and New York Civil Practice Laws and Rules § 5225(b), for an order compelling NBC Universal ("NBC"), Charter Communications ("Charter") and DirecTV, LLC ("DirecTV") (each, a "Garnishee") to turn over to Plaintiff all funds that are in each Garnishee's possession, and are or were otherwise due and owing to Defendant-and Judgment Debtor Channel One Russia, as identified in the Sellier Declaration with respect to each Garnishee, and such other relief as the Court deems proper.

Dated: New York, New York  
May 12, 2025

ROTTENBERG LIPMAN RICH, P.C.

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